

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO: 5:17-CV-356

RICARDO MONDRAGON, EUSTORGIO	)
ESPINOBARROS FELICIANO,	)
JUAN CONTRERAS, CUTBERTO ORTIZ	)
HERNÁNDEZ, ALEJANDRO JIMENEZ	)
GONZALEZ, RENATO ROMERO	)
ACUÑA, JOSÉ TAPIA, ANASTACIO	)
LOPEZ SOLIS, and ABDON QUIRASCO	)
SIXTECO, on behalf of themselves and all	)
other similarly situated persons,	)
	)
Plaintiffs,	)
	)
v.	)
	)
SCOTT FARMS, INC., ALICE H. SCOTT,	)
LINWOOD H. SCOTT, JR., LINWOOD H.	)
SCOTT III, DEWEY R. SCOTT, JFT	)
HARVESTING INC., JUAN F. TORRES	)
OASIS HARVESTING, INC.,	)
and RAMIRO B. TORRES	)
	)
Defendants.	)
_____	)

**JOINT MOTION FOR PRELIMINARY APPROVAL OF COLLECTIVE  
ACTION AND CLASS ACTION SETTLEMENT**

Plaintiffs and Scott Farms, Inc., Alice H. Scott, Linwood H. Scott, Jr., Linwood H. Scott, III, and Dewey R. Scott (collectively “Defendants”) jointly move this Court for entry of the stipulated order accompanying this Joint Motion approving the class action settlement agreement (attached as Exhibit 1). The terms of settlement are set on in Exhibit 2 to this Motion. Declarations of Plaintiffs’ Counsel Carol Brooke and Robert Willis accompany this Motion and are designated as Exhibit 3 and Exhibit 4, respectively.

**WHEREFORE** the parties respectfully request that the Court enter the proposed Order granting preliminary approval of the Settlement Agreement and granting the parties any other relief that the Court deems appropriate and necessary.

Respectfully submitted, this the 22<sup>nd</sup> day of October 2019.

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Civil Action No. 5:17-cv-356-FL

# CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2019, a copy of the foregoing *Motion* was filed with the Clerk of Court using the CM/ECF system, which will automatically serve all counsel of record, including:

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